

Exhibit C

Ullman, Emily

From: Stephen Wussow <swussow@clfnola.com>
Sent: Friday, October 25, 2019 10:34 AM
To: Ullman, Emily
Cc: Celeste Brustowicz; Marc Dann; 'Kevin Thompson'; Kent Harrison Robbins - KHR Law Offices
Subject: Re: NAS fact sheets Clarification Sought

[EXTERNAL]

We are providing fact sheets and related documents only for those plaintiffs who plan to seek appointment as class representative. At present, the plaintiffs you have referenced do not intend to seek appointment.

Stephen Wussow
Associate Attorney

Cooper Law Firm, L.L.C.
1525 Religious Street
New Orleans, Louisiana 70130
Phone: (504) 399-0009
Fax: (504) 309-6989

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From: Ullman, Emily <eullman@cov.com>
Sent: Wednesday, October 23, 2019, 11:08 AM
To: Chad Klees
Cc: Stephen Wussow
Subject: RE: NAS fact sheets Clarification Sought

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I believe I have been forwarded each of those items. To be clear, I do not think any defendant has received fact sheets for plaintiffs Artz, Salmons, and Flanagan. Is that correct?

Thanks,

Emily

From: Chad Klees <cklees@clfnola.com>
Sent: Wednesday, October 23, 2019 12:06 PM
To: Ullman, Emily <eullman@cov.com>
Cc: Stephen Wussow <swussow@clfnola.com>
Subject: FW: NAS fact sheets Clarification Sought

[EXTERNAL]

Good Morning Ms. Ullman,

Stephen has forwarded your email to me so that I may revise our distribution list.

I will follow your directions below for revisions.

This morning I sent out some HIPAA forms prior to receiving your email. But, you were on those distribution lists and should have received the HIPAA's.

To date we have served: discovery on October 15th; Fact Sheets; and, today sent out HIPPA forms.

I'd like to confirm please, that you have received those emails, particularly the discovery served on October 15th.

Thank you.

From: Ullman, Emily <eullman@cov.com>

Sent: Wednesday, October 23, 2019 10:06:20 AM

To: Stephen Wussow <swussow@clfnola.com>

Subject: RE: NAS fact sheets Clarification Sought

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Stephen,

Please copy the xopiodNAS@arnoldporter.com list on all correspondence about these cases. Additionally, please use me as the contact person for McKesson and remove Nathan Shafroth, Paul Schmidt, Dwain Clifford, Kevin Collins, and Geoff Hobart from your list. Thank you.

Best,

Emily

From: Stephen Wussow <swussow@clfnola.com>

Sent: Tuesday, October 22, 2019 11:07 AM

To: Ullman, Emily <eullman@cov.com>; Celeste Brustowicz <cbrustowicz@clfnola.com>

Cc: Scott R. Bickford <srb@mbfirm.com>; Chad Klees <cklees@clfnola.com>; xopiodNAS@arnoldporter.com

Subject: RE: NAS fact sheets Clarification Sought

[EXTERNAL]

Apologies Emily, apparently you weren't on the distribution list I have. Can you share yours with me so we can update?

Stephen Wussow

Associate Attorney

Cooper Law Firm, L.L.C.

1525 Religious Street

New Orleans, Louisiana 70130

Phone: (504) 399-0009

Fax: (504) 309-6989

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From: Ullman, Emily <eullman@cov.com>

Sent: Tuesday, October 22, 2019 9:50 AM

To: Celeste Brustowicz <cbrustowicz@clfnola.com>

Cc: Scott R. Bickford <srb@mbfirm.com>; Chad Klees <cklees@clfnola.com>; Stephen Wussow <swussow@clfnola.com>; xopioidNAS@arnoldporter.com

Subject: RE: NAS fact sheets Clarification Sought

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I have now been forwarded them from others. Please do keep our distribution list copied on correspondence like this – it helps us keep track! Thanks very much.

From: Ullman, Emily <eullman@cov.com>

Sent: Tuesday, October 22, 2019 10:39 AM

To: Ullman, Emily <eullman@cov.com>; Celeste Brustowicz <cbrustowicz@clfnola.com>

Cc: Scott R. Bickford <srb@mbfirm.com>; Chad Klees <cklees@clfnola.com>; Stephen Wussow <swussow@clfnola.com>; xopioidNAS@arnoldporter.com

Subject: RE: NAS fact sheets Clarification Sought

Hi Celeste,

I don't believe we've received anything from you yet. Have you served the fact sheets? Thanks!

Best,

Emily

From: Ullman, Emily <eullman@cov.com>

Sent: Monday, October 21, 2019 3:28 PM

To: Celeste Brustowicz <cbrustowicz@clfnola.com>

Cc: Scott R. Bickford <srb@mbfirm.com>; Chad Klees <cklees@clfnola.com>; Stephen Wussow <swussow@clfnola.com>; xopioidNAS@arnoldporter.com

Subject: RE: NAS fact sheets Clarification Sought

External E-mail

Celeste,

There is an existing and governing protective order in this litigation – CMO 2 – and I believe you have all had to sign onto it already in order to get access to Defendants' documents. (It has provisions about filing and materials being destroyed.) You can designate materials Confidential under that protective order as appropriate. Thanks!

Best,

Emily

From: Celeste Brustowicz <cbrustowicz@clfnola.com>

Sent: Monday, October 21, 2019 3:15 PM

To: Ullman, Emily <eullman@cov.com>; Celeste Brustowicz <cbrustowicz@clfnola.com>

Cc: Scott R. Bickford <srb@mbfirm.com>; Chad Klees <cklees@clfnola.com>; Stephen Wussow <swussow@clfnola.com>; xopioidNAS@arnoldporter.com

Subject: Re: NAS fact sheets Clarification Sought

[EXTERNAL]

Emily;

I wish this process allowed for more time. May we please agree to a protective order covering the nas fact sheets. It is obviously private confidential information.

We propose that if filed in court it will be under seal, anyone who works with these materials is subject to the protective order, and when this is over, yes it will end, to be destroyed or returned.

Celeste

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: "Ullman, Emily" <eullman@cov.com>

Date: 10/18/19 2:05 PM (GMT-06:00)

To: Celeste Brustowicz <cbrustowicz@clfnola.com>

Cc: "Scott R. Bickford" <srb@mbfirm.com>, Chad Klees <cklees@clfnola.com>, Stephen Wussow <swussow@clfnola.com>, xopioidNAS@arnoldporter.com

Subject: RE: NAS fact sheets Clarification Sought

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Celeste,

For request G, we are willing to limit the substance of the communication to those that are related either (1) to the baby or (2) to the birth mother's use of opioids (whether prescription or illicit).

On F, we are not willing to limit to a representative sample.

Also, we'd appreciate your response on Andy's email of Wednesday regarding other expert reports / CVs (reattached for your reference). Thanks!

Best,

Emily

From: Celeste Brustowicz <cbrustowicz@clfnola.com>

Sent: Friday, October 18, 2019 11:08 AM

To: Ullman, Emily <eullman@cov.com>

Cc: Scott R. Bickford <srb@mbfirm.com>; Chad Klees <cklees@clfnola.com>; Stephen Wussow <swussow@clfnola.com>

Subject: NAS fact sheets Clarification Sought

[EXTERNAL]

Hello Emily: Hope all is well.

We are working on your fact sheets. Need clarification:

G. All journals, diaries, notes, letters, or emails written by you, the birth mother or the NAS Plaintiff from the NAS Plaintiff's birth to the present.

Does this mean related to the baby? Otherwise seems irrelevant and burdensome.

As for photographs etc. on Request F- would a representative sampling be okay?

Celeste Brustowicz
Managing Partner

Cooper Law Firm, L.L.C.
1525 Religious Street
New Orleans, Louisiana 70130
Phone: 504.399.0009
Direct: 504.291.1344
Fax: (504) 309-6989

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